



October 11, 2017

Chairman Ajit Pai
Commissioner Mignon Clyburn
Commissioner Michael O'Rielly
Commissioner Brendan Carr
Commissioner Jessica Rosenworcel

c/o Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: ET Docket No. 14-165 and GN Docker Nos. 12-268 and 14-166 Via Electronic Filing

Dear Chairman Pai, Commissioner Clyburn, Commissioner O'Rielly, Commissioner Carr,
Commissioner Rosenworcel, and Ms. Dortch,

My name is Raymond Gibson and I am an adjunct faculty Sound Designer and instructor for the Theater and Dance Department at Cypress College, a community college located in Cypress, California. We are a regular user of Wireless Microphones throughout the instructional year for the production of Musicals, Plays, Dance Concerts, and other similar events to serve our student body of approximately 16,000 and the surrounding communities. I am writing because we are concerned about the available spectrum and protection for our devices.

We strongly support the Commission's proposal to expand Part 74 license eligibility to include persons and organizations that can demonstrate the need for professional, high-quality audio and have the capability of providing it through the conscientious use of wireless microphones. We support and endorse the Comments filed in these dockets by The Performing Arts Wireless Microphone Working Group.

Both professional and academic performing arts organizations hold thousands of performances each year, and the use of reliable wireless microphones are essential to producing high quality performances. Protection from interference is essential to these performances.

We at Cypress College use both wireless lavalier and wireless handheld transmitters. We put on six major productions per year, as well as countless smaller ones. The vast majority of these require the use of our wireless equipment, in the range of 15-25 depending on the requirements of the show. For the College's 50th anniversary performance of *Follies* last semester, we used 38 wireless lavalier transmitters that included several rental units.



The vast majority of our wireless transmitters operate in the High UHF band, with a small handful in the Low UHF band. All of them offer a wide tuning range that encompasses about 30% of the band they are in. Half of the wireless transmitters we own are analog, and the remaining are a digital analog hybrid.

We own 24 units currently, and rent any that are needed above this number. Half of the older units are nearing the end of their useful life but are still functional at this point, while the other half were purchased new when the 700MHz band became unavailable and we were forced to retire some older units that were then illegal to operate. We spent over \$25,000 at the time to procure new transmitters that were legally operable. These newer units still have several years of use available with proper care, however they are located in the Upper UHF band and are threatened by the FCC's pending actions.

I have been working for Cypress College for over 10 years now in this capacity after receiving a Bachelors of Arts in Sound Design from California State University Fullerton. I have expanded my knowledge of radio frequency communication as my role coordinating the wireless frequencies in our use to prevent interference. I am also a licensed amateur operator, KK6YLP.

I would urge the Commission to grant a Part 74 license if an applicant can provide certification of:

- A mission statement of providing performing arts to the public;
- A history of professional-quality wireless audio presentations to audiences without interference;
- Technical guidance and frequency coordination by qualified professionals (active in audio engineering who have academic degrees or equivalent professional experience and who are familiar with radio-frequency coordination);
- A commitment to register for protection only the frequencies, times, and locations actually needed; and
- A practice of keeping logs of all wireless microphone uses, including frequencies, for all performances.

I want to thank the commission for their consideration in the reading of my letter. I feel the arts are important to our society, and the physical and financial strain of having to completely replace thousands of dollars of perfectly functioning equipment is disheartening. Cypress is in a densely populated television market (Los Angeles) and finding open frequencies is always a challenge. Completely eliminating the use of UHF bands would force us into expensive and experimental technologies that may not provide as high quality of an experience as we had with our existing equipment. I hope that the commission will expand the rules of Part 74 to accommodate performing arts organizations and educational institutions that use fewer than 50 wireless microphones.

Thank you,

Raymond Gibson